The Honorable James L. Robart

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

THE HANOVER INSURANCE COMPANY,

Plaintiff,

v.

NORTHWEST COMMERCIAL REAL ESTATE INVESTMENTS, LLC, a Washington limited liability company, dba NORTHWESTAPARTMENTS.COM and NORTHWEST APARTMENTS; MORGRO INVESTMENTS, LLC; RGD PROPERTY SERVICES, LLC; METRO PROPERTY SERVICES, LLC; DAVID BUCK; AARON FREIN; TERRY BERNARD; and JOHN BEUTLER,

Defendants.

NO. 2:21-cv-01559-JLR

SECOND STIPULATED MOTION AND PROPOSED ORDER TO EXTEND PRETRIAL DEADLINES

NOTE ON MOTION CALENDAR: FEBURARY 14, 2022

Pursuant to Local Civil Rules 10(g) and 16(b)(6), the parties respectfully submit that good cause exists for this Second Stipulated Motion to Extend Pretrial Deadlines. Mediation in the underlying liability action was originally scheduled for February 10, 2022. It was recently rescheduled for March 15, 2022 because additional document discovery was needed in order to ensure the underlying parties had adequate information to make informed offers/counter-offers at

SECOND STIPULATED MOTION AND PROPOSED ORDER TO EXTEND PRETRIAL DEADLINES - 1 No. 2:21-cv-01559-JLR

GORDON TILDEN THOMAS CORDELL 600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 mediation. If successful, the mediation may resolve or substantially narrow the issues in this litigation. The parties would like to conserve their resources and the Court's time and resources pending the outcome of underlying mediation. The parties thus jointly request that the Court issue an order setting forth the following altered pretrial deadlines:

Event	Current Due Date	New Due Date
Responses to Complaint due	March 11, 2022	April 1, 2022
Deadline for FRCP 26(f) Conference	March 18, 2022	April 8, 2022
Initial Disclosures Pursuant to FRCP 26(a)(a)	March 25, 2022	April 15, 2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	April 1, 2022	April 22, 2022

DATED this 14th day of February, 2022.

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ORDER

IT IS HEREBY ORDERED that pretrial deadlines are altered as follows:

Event	Current Due Date	New Due Date
Responses to Complaint due	March 11, 2022	April 1, 2022
Deadline for FRCP 26(f) Conference	March 18, 2022	April 8, 2022
Initial Disclosures Pursuant to FRCP 26(a)(a)	March 25, 2022	April 15, 2022
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DATED this 14th day of February, 2022.

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Hon. James L. Robart U.S. District Judge